

**FILED**

JUL - 3 2019 *fb*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Julie Goldberg-Botvin, et al.,	)	
	)	
Plaintiffs,	)	Case No. 14-cv-03002
	)	
v.	)	Judge Edmond E. Chang
	)	Courtroom 2119
Islamic Republic of Iran,	)	
	)	Magistrate Judge Jeffrey Cole
Defendant.	)	

**NOTICE OF THIRD-PARTY CITATION TO DISCOVER ASSETS**

<b>Name of Case:</b>	Julie Goldberg-Botvin et al. v. Islamic Republic of Iran
<b>Last Known Addresses of Judgment Debtor and Attorney for Judgment Debtor:</b>	Islamic Republic of Iran c/o Mohammed Javd Zarif Iranian Foreign Minister Ministry of Foreign Affairs Imam Khomeini Street Tehran, Iran
<b>Names and address of Attorney for Judgment Creditor:</b>	Gregory H. Berman gberman@steptoe.com STEPTOE & JOHNSON LLP 115 South LaSalle Street, Suite 3100 Chicago, Illinois 60603
<b>Amount of Judgment:</b>	\$40,890,000.00, plus post-judgment interest
<b>Name of Person Receiving Citation:</b>	American Express Travel Related Services Co. Inc. 605 North Michigan Avenue Chicago, IL 60611
<b>Return Date and Time:</b>	December 16, 2019 at 9:30 a.m.
<b>Location:</b>	219 S. Dearborn Street Room 2119 Chicago, Illinois 60604

**NOTICE:** The court has issued the attached Citation against the person named above. The citation directs that person to appear at the address listed above to be examined for the purpose of allowing the judgment creditor to discover income and assets belonging to the judgment debtor or in which the judgment debtor has an interest. The citation was issued on the basis of a judgment against the judgment debtor in favor of the judgment creditor in the amount stated above. On or after the date stated above, the court may compel the application of any discovered income or assets toward payment on the judgment.

The amount of income or assets that may be applied toward the judgment is limited by federal and Illinois law. **THE JUDGMENT DEBTOR HAS THE RIGHT TO ASSERT STATUTORY EXEMPTIONS AGAINST CERTAIN INCOME OR ASSETS OF THE JUDGMENT DEBTOR THAT MAY NOT BE USED TO SATISFY THE JUDGMENT IN THE AMOUNT STATED ABOVE:**

- (1) Under Illinois or federal law, the exemptions of personal property owned by the debtor include the debtor's equity interest, not to exceed \$4,000 in value, in any personal property as chosen by the debtor; social security and SSI benefits; public assistance benefits; unemployment compensation benefits; workers' compensation benefits; veterans' benefits; circuit breaker property tax relief benefits; the debtor's equity interest, not to exceed \$2,400 in value, in any one motor vehicle; and the debtor's equity interest, not to exceed \$1,500 in value, in any implements, professional books, or tools of the trade of the debtor.
- (2) Under Illinois law, every person is entitled to an estate in homestead, when it is owned and occupied as a residence, to the extent in value of \$15,000, which homestead is exempt from judgment.
- (3) Under Illinois law, the amount of wages that may be applied toward a judgment is limited to the lesser of (a) 15 percent of gross weekly wages or (b) the amount by which disposable earnings for a week exceed the total of 45 times the federal minimum hourly wage or, under a wage deduction summons served on or after January 1, 2006, the Illinois minimum hourly wage, whichever is greater.
- (4) Under federal law, the amount of wages that may be applied toward a judgment is limited to the lesser of (a) 25 percent of disposable earnings for a week or (b) the amount by which disposable earnings for a week exceed 30 times the federal minimum hourly wage.
- (5) Pension and retirement benefits and refunds may be claimed exempt under Illinois law.

The judgment debtor may have other possible exemptions under the law.

**THE JUDGMENT DEBTOR HAS THE RIGHT AT THE CITATION HEARING TO DECLARE EXEMPT CERTAIN INCOME OR ASSETS OR BOTH.** The judgment debtor also has the right to seek a declaration at an earlier date, by notifying the clerk in writing at 219 South Dearborn Street, Chicago, Illinois 60604. When so notified, the Clerk of the Court will provide a hearing date and the



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**necessary forms that must be prepared by the judgment debtor or the attorney for the judgment debtor and sent to the judgment creditor regarding the time and location of the hearing. This notice may be sent by regular first-class mail.**

Dated: July 02, 2019

/s Gregory H. Berman

Gregory H. Berman

Gregory H. Berman  
gberman@steptoe.com  
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Chicago, Illinois 60603  
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F: (312) 577-1370  
*Attorney for Plaintiffs Julie Goldberg-Botvin, et al.*

**CERTIFICATE OF MAILING**

I hereby certify that, within three business days of service on the citation respondent of the Third-Party Citation to Discover Assets, I served upon the judgment debtor in this cause a copy of this Third-Party Citation Notice and a copy of the Third-Party Citation to Discover Assets by first class mail to the judgment debtor and counsel for judgment debtor at the following addresses:

Islamic Republic of Iran  
c/o Mohammed Javd Zarif  
Iranian Foreign Minister  
Ministry of Foreign Affairs  
Imam Khomeini Street  
Tehran, Iran

/s Gregory H. Berman

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*Attorney for Plaintiffs Julie Goldberg-Botvin, et al.*